

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

Amarillo Division

Christopher K McNeill

) Case No.

2:23-CV-041-Z

(to be filled in by the Clerk's Office)

Plaintiff(s)

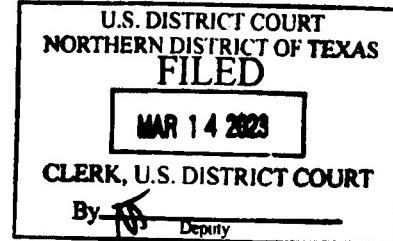
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Tyson Fresh Meats, Inc.

) Jury Trial: (check one)

Yes No



Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Christopher K. McNeill

714 S Austin Street Apt B

Amarillo

Texas, 79106

806-410-6215

cmcneill0114@gmail.com

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

A2

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1

Name	Tyson Fresh Meats, Inc.
Job or Title (<i>if known</i>)	
Street Address	5000 FM 1912
City and County	Amarillo, Potter
State and Zip Code	Texas, 79108
Telephone Number	(806) 335-1531
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	Tyson Fresh Meats, Inc.
Street Address	5000 FM 1912
City and County	Amarillo, Potter
State and Zip Code	Texas, 79108
Telephone Number	(806) 335-1531

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (*check all that apply*):

- Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- Other federal law (*specify the federal law*):

Relevant state law (*specify, if known*):

Relevant city or county law (*specify, if known*):

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- Failure to hire me.
 Termination of my employment.
 Failure to promote me.
 Failure to accommodate my disability.

 Retaliation.
 Other acts (specify): Religious Discrimination, Failure to reasonably accommodate

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the Disparate Impact Theory of Employment Discrimination.)

Disparate Impact Theory
of Employment Discrimination
Retaliatory
Religious
Race

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

October 5, 2021. October 13, 2021. December 15, 2022 A series of dates from Oct 5-2021 - 01-16-2023
→ mark out

C. I believe that defendant(s) (check one):

- is/are still committing these acts against me.
 is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

- race _____
 color _____
 gender/sex _____
 religion Christian
 national origin _____
 age (year of birth) _____ (only when asserting a claim of age discrimination.)
 disability or perceived disability (specify disability)
Neuropathy, High Blood Pressure.

E. The facts of my case are as follows. Attach additional pages if needed.

All Facts are Attached # 2-11

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Facts and 2-11

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission or the charge filed with the human rights division.)

IV. Information or Relief Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)
11-03-2021

- B. The Equal Employment Opportunity Commission (check one):

- has not issued a Notice of Right to Sue letter.
 issued a Notice of Right to Sue letter, which I received on (date) 12/14/2022

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

- 60 days or more have elapsed.
 less than 60 days have elapsed.

V. Relief

Attached p 11

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-14-20239-13-2023

Signature of Plaintiff



Printed Name of Plaintiff

Chris Taylor K McNutt**B. For Attorneys**

Date of signing: _____

Signature of Attorney



Printed Name of Attorney



Bar Number



Name of Law Firm



Street Address



State and Zip Code



Telephone Number



E-mail Address



1. Christopher K McNeill (CKM) Pro Se Plaintiff, states true facts starting on 10-05-2021 through 01-16-2023. CKM will show that Tyson Fresh Meats Inc. Discriminated against CKM when they told him. (if you are not fully vaccinated by November 1 2021 you don't come hereyou won't be let in..... and you don't get paid any money.... for not coming here.....) That is what a human does when they get fired or if they apply at a job and do not get the job. When was the last time any human had a job that they did not ever go to and that did not pay them. Never!

Not going to a place and Not being paid is the definition of not working at that place. We may ask 12 out of 12 people or 25 million out of 25 million people of sound mind, not anyone in the history of history ever had that job they didn't go to and didn't pay them. Everyone reading this has never not gone to their work to not get paid and told another human that they work there.....

Tyson Fresh Meats Inc. calls it leave of absence plus. Tyson Fresh Meats also wants to gas light CKM this Court and the United States of America citizens that "not going to a place or company and that and that company not paying you" is the definition of reasonable accommodation.

Citing prior court rulings and the EEOC and other's cited courts rulings below it is an illegal act impose a blanket policy on employees and that has had an Desperate Impact on CKM. Tyson Fresh Meats also had a signed bargained agreement to accommodate religious accommodation requests and an interactive process must take place for that to be considered an attempt. I was trying everything and they intentionally hid that from me personally, my Union and Tyson together on 10-05-2021 my first request. That is Discrimination due to my Religion due to a Disparate Treatment to hide an agreement from me personally. So the policy of Fired or No Work No Pay (leave of absence plus) that Tyson Fresh Meats Inc. tells everyone is a reasonable accommodation is actually a policy that discriminated against my religion due to Disparate Impact. And hiding from me personally the Bargained Agreement is Discrimination due to my Religion by Desperate Treatment.

2. CKM turned in 2 separate religious accommodation requests on 2 separate days. On 10-05-2021 CKM went to HR Manager office Trent Pontias to turn in his Religious Accommodation Request when he got in the office it was both Trent and the union that represented him that were both in the office. CKM handed the request to Mr Pontius and Mr Pontius didn't even look at it he put it over there to the scanner at the same time the he was telling me well you know the only thing we are doing is giving you leave of absence for a year with no pay and then you'll probably be fired. The Union rep was stating the same thing that all there doing. Mr Pontius looked at me and said or you could be fired on the spot right now you can be terminated right now right this second! They talked at me in such a way that was very demeaning and I wasn't taking it, I was not accepting that I asked for paperwork, I got mad and they got mad, but the union and Mr Pontius just told me there's only two things I can do is have leave of absence with no pay and I'll be fired in a year or be fired on the spot and both meant I

go from having money from a job to 0 income in which I told them I can't go with 0 income! So requesting legal in the United States of America a religious accommodation Tyson Fresh Meats Inc. Offered Fired now or leave of absence with 0 dollar pay. If you don't go to sia company and they don't pay you, you don't work there. I was asking if there was anything else. With only two options. So I went back to work and didn't know what in the world was going on. I was wondering if I was in America.

3. The only reason CKM turned in a second accommodation request to Tyson Fresh Meats Inc. Manager of Human Resources Trent Pontias was because the day before he did the governor of Texas had signed into law that it was illegal for any private or public company to mandate a vaccine. I wasn't even going to take it in there but I thought man I better these guys are being such a jerks to me so I took it in there and he did not care he I think his statement was I don't care what the governor of Texas does! Nothing has changed. You either get vaccinated or you're not working here on November 1 2021. That's how the HR manager said it then I said dude I want some paperwork stating that I do not accept this and he said you want some paperwork if you accept it you get it after you sign. I said no I don't accept it he said you only get paperwork if you accept the accommodation. I said is there anything else that's not an accommodation that's firing me. I went back to work not knowing what I would do on the 13th of October 2021. He was very rude and asked me to leave his office so I went back to work.

4. Not knowing what to do I talked and prayed to Paul he's my pastor at the church I lived at. I mean I didn't know what else to do so I'd been calling the corporate, so I emailed the corporate and on that(the court has) email I begged them to at least reply to me, with no reply.

5. Through the Discrimination and fear of having no income CKM through no want if CKM and coercion of TYSON FRESH MEATS INC. CKM took the medical treatment on 10-18-2021 the last date to not get fired and be fully vaccinated by the November 1 2021 TYSON Fresh Meats fire employees date!

6. CKM went back to work and was taken to the nurse by his supervisor within the first 5 minutes of the work day. CKM went to work because he didn't really know anything was wrong. His face was twitching a little bit and his supervisor took him down to the nurse. Well they took his blood pressure and automatically sent him home and said he had to have guidelines from his doctor in which he didn't even have at the time stating what were the safe medical limits that Chris could work at with his high blood pressure. CKM I've never had any medical issue with blood pressure in his life and he was 49 years old he didn't even have a medical doctor that was his primary he was soon to find all this stuff out.

7. CKM has been employed since 07-12-2016 at Tyson Fresh Meats Inc on or around 10-22-2021 over 5 years. CKM had insurance the entire 5 plus years and did not have a primary doctor due to the fact that CKM was in very good health, led a very healthy lifestyle and never had any high blood pressure, any balance, walking, running, climbing etc. problems whatsoever. CKM had never had any medical issues besides he wore rx glasses to drive at night.

8. CKM has had High Blood Pressure and has been diagnosed with life long PERIPHERAL NEUROPATHY and can't run walk or do any physical thing he used to do in any way he could before he has pain that fluctuates in severe to manageable and never knows what the next moment will be. Some days he can't walk with a cane, some days he can't even want to get out of bed. CKM fights depression as anyone whose life went from very physically fit to determined disabled by the United States Social Security Disability and now is at only 50 years old no longer capable of earning, playing basketball, riding bikes or any physical activities with his children. This is due to the Discrimination and coercion, Disparate impact, and Disparate treatment of CKM by Tyson Fresh Meats.

9. Since then they Tyson fresh meat inc. sent me home due to high blood pressure. Tyson Fresh meats Inc. sent numerous letters threatening to cancel CKMs insurance in which they finally did. They have sent him letters demanding he be in their office within 72 hours because he has not been at work in 6 months like they didn't know they hurt me, demanding CKM needed to talk about this matter in the office of HR Manager Farren. They called CKM and offered him workman's comp through the company and he had to sign away all his rights and they would give him money that was badly needed at the time but he had to turn it down. They terminated CKM one day after they found out that EEOC sent CKM and Tyson fresh meat inc. at the exact same time the right to sue letter. (that letter doesn't state either way they did not investigate and they sent the right to sue letter Tyson fresh meats inc terminated in less than 24 hours with no notification. And then after that CKM lost his long-term disability within 31 days after that same right to sue letter. I'll explain below how Tyson fresh meats inc. through those emails time dated, letters some of which were certified but all dated, phone calls that Chris made or received himself, including vacation that he never received, and being fired never told about it the day after Tyson got the right to sue letter. I will show below specifically how all this translates into Intentional Infliction of Emotional Distress, Retaliation, and will show the negligence of Tyson fresh meats Inc.

I Religious Discrimination

The Plaintiff Christopher K McNeill

A. Disparate Impact

CKM alleges the Defendant violated Title VII of the Civil Rights Act of 1964 by discriminating against CKM on the basis of CKM'S religion by failing to reasonably accommodate, forcing him to make an unimaginable decision of no money or medical treatment. By coercions of no money so you must follow the policy and be fully vaccinated by November 1 2021.

B. Disparate treatment.

The defendant chose to hide from CKM by himself singly, the signed Bargained Agreement on 2 separate requests for accommodations CKM asked if there was any other solutions that Tyson Fresh Meats Inc. knew of and they refused tell him of an agreement that they signed on his behalf CKM only became aware of an agreement in the EEOC reply from his Union and has provided the court the agreement. That is disparate treatment of CKM due to his religious practices or beliefs.

1. Plaintiff submitted a religious accommodation request to Defendant's HR manager Trent Pontias {no longer works at Tyson) and his Teamsters Union representative. However, Defendant failed to provide a reasonable accommodation and didn't even read the request, Instead providing Plaintiff, with only two options: take a leave of absence for one year with no pay or be terminated now. Never told CKM that Tyson Fresh Meats Inc. had signed an agreement with my union although asked if anything else. More details of both in the above timeline if events.

Similar cases:

The Equal Employment Opportunity Commission (EEOC) has issued guidelines on religious discrimination In the workplace. These guidelines state that employers must provide reasonable accommodations for employees' religious beliefs unless doing so would cause an undue hardship for the employer. The guidelines also state that employers must evaluate each request for accommodation on a case-by-case basis and cannot rely on blanket policies.

2. In Ansonia Board of Education v. Philbrook, 79 U.S. 60 (1866), the Supreme

'Court held that an employer must make reasonable accommodations for an employee's religious beliefs or practices, unless doing so would cause undue hardship.
(CKM vs Tyson Fresh Meats Inc. cannot be a hardship bargained agreement to accommodate)

AS. In Abercrombie & Fitch v. EEOC, 575 U.S. ___ (2015), the Supreme Court held 'that an employer cannot discriminate against an employee or applicant based on their religious beliefs, and must provide a reasonable accommodation for a religious practice, unless doing so would cause undue hardship.

A4. in Trezza v. Hartford Healthcare, 293 F. Supp. 3d 453 (D. Conn. 2018), a federal court held that an employer must engage in an interactive process with an employee who requests religious accommodation, and cannot rely on BLANKET policies to deny an accommodation.

(CKM vs Tyson Fresh Meats Inc. no interaction only 2 options and the option was a blanket policy)

AS.In Baker v. The Home Depot, USA, Inc, 445 F3d 54) (2d Cir, 2006), a federal appeals court held that an employer cannot question the sincerity of an employer's religious beliefs unless the employee's behavior is Inconsistent with 'their stated beliefs.

(I lived in my church, and they never asked or questioned my religious beliefs)

II Intentional Infliction of Emotional Distress:

Plaintiff alleges that Defendant intentionally inflicted emotional distress upon them through their actions. To establish a claim for Intentional infliction of emotional distress, Plaintiff must establish the following elements:

A. Defendant engaged in extreme and outrageous conduct

(The letter demanding 72 hours in HR office like they had no idea I was injured by them take me out of employment records)

B. Defendant Intended to cause, or recklessly disregarded the probability of causing, emotional distress;

(they knew I had medical issues and said we're taking me out of employment record they wanted me to stress or why send the letter they absolutely knew I know Farren knew he sent it)

C. Plaintiff suffered severe or extreme emotional distress;

(I thought they were taking my only way to fight them away I sent an email showing my demeanor after the vacation pay)

D. Defendant's conduct was the cause of Plaintiff's emotional distress.

(I show in email that they were the cause not only have they physically disabled me now they are mentally stating no vacation pay calling telling me e here's money but must sign rights away because they own their own work and comp. 72 hours or else.);

1. Plaintiff alleges that Defendant engaged in extreme and outrageous conduct by sending CKM a letter with a 72-hour deadline to comply in person titled..... Only person in Tyson that hadn't reported to work in 6 months so the HR manager decided to just absolutely crush another human. I have tried to and in evidence that email showing my state of mind was a terrible day!

RETURN TO WORK It stated (thru review of our employment record shows you have been off work since 10-25-2021 till present I need to speak to you In person regarding this matter within 72 hours of receipt of this letter. If You fail to respond twill regretfully have to remove you from our employment records,(this certified letter is in evidence) which caused Plaintiff great

emotional distress CKM made notes on actual document of time called 3:55 who talked to female called again at 3:08 Friday he was scared that the Defendant was going to delete all records like he never worked here like The HR Director Faren stated I WILL REMOVE YOU FROM EMPLOYMENT

RECORDS! This was intentional and the Defendant absolutely knew I was injured, Tyson doesn't send letters to no showed if 6 months that is proof I was singled out by the HR director Farren he is so scary and true to be a like rich guy way above everyone else I hope they reprimand him after this ends letters to all employees that haven't been to work in 6 months, with no contact, it is only me I am positive. I am the only no show to work for 6 months that was still employed and the HR Director sends a letter stating they are taking them out of employee records. Specifically when the Plaintiff went to work on 10-22-2021 he didn't know he had high blood pressure he got taken to the nurse by his supervisor. The Defendant's nurses sent him home on 10-22-2025 for high blood pressure (BP) and on the nurses note states Plaintiff must be cleared by physician and wants parameters of BP that are safe for Plaintiff to work with and Plaintiff had never had High BP in his life, The Defendant knew that the Plaintiff was on family medical leave he was on long term Disability and the Defendant got information directly from Unum the insurance company that handles the policy that Tyson either is self Insured or has policy. But Tyson is updated 2 times a month. (Court has a copy of this document)

2. Plaintiff also alleges that Defendant sent multiple letters threatening to end the Plaintiff's health care Insurance, causing Plaintiff to feel stressed and anxious as with brain scans, nerve conduction studies, Dr appointments etc the Plaintiff needed healthcare coverage for the first time in his Life. The Defendant was well aware that costs were getting expensive health care and was intentionally 'trying to hurt me again. I needed that insurance and they finally did in fact cancel it. 5 plus year employee without Insurance. And they are helping me no they Intentionally hurting me , felt so alone with no one on my side, no one helping me, and them trying more and more to hurt me mentally they already hurt me physically.

3. I sent to the EEOC about them not paying me my vacation. It can show at the time how severely bad this Defendant Made me feel.
(sent it to the EEOC as the only kind people If any help at this time was them. It will show the emotional state I was in and still am in a lot of the time. The Defendant physically hurt me and then Intentionally tried to break me mentally down to nothing again and again this email is about vacation. I still think that they owe me vacation.

4. Additionally, Defendant called Plaintiff and offered them workman's compensation, knowing that Plaintiff could not accept it due to the requirement to sign away their rights. It is self owned workers compensation and I needed it so badly... the money but there was a catch.

That's the only reason that Tyson would ever offer anything like that as a matter of fact that's why they own their workers compensation is the way to get them to help you really hurts you again. I would have to sign a contract that would sign my right to ever hold them accountable in a court this way. So I needed the money for everything in to, especially the medical bills that I had no Insurance for anymore, That was Intentionally trying to hurt me again is exactly how I felt after that cal like we have plenty of money

to help you. All you have to do is never hold us accountable and life is existence now. It was intentionally hurting me again if I took it, I can't hold the Defendants accountable if I don't get better. I haven't but I was so close and needed that money for food, rent Drs etc. But I said no thank you I could not.

I am only 50 and extremely healthy and if I'm out of work and my life stays then they owe me half of a life this it's not even close to what they owe me and my family, My plan was to get back to auto management when kids can both drive, so wouldn't need to be off at 3pm dailey any longer, their mom isn't with us any longer so ya that was the plan making substantially more Income than what I was making at Tyson.

5. I don't understand why they are such bully tactics belittling and Just In the world's face like they are better, smarter, faster, and people won't notice them deceiving the Plaintiff, Court, themselves..why even send a 72 hour notice when any human with a sound mine will know that without a doubt the defendant would have terminated any employees not showing up for a week probably, a month yes, months and they met Like you've not been to work you have 72 hours In person or else. I was very distraught but typing reading seeing that they have just gone too far, think That these tactics are going to backfire, There Is absolutely no reason that upper management HR should be doing that I hope that not only win after this case before Is finished all facts with evidence, I hope tyson reprimands the especially belittling managers like him.

III Retaliation:

Plaintiff alleges that Defendant unlawfully retaliated against them for engaging in protected activity. To establish a claim for retaliation, Plaintiff must establish the following elements:

- 1 Plaintiff was engaged in protected activity;
(complaint with EEOC)
2. Defendant took adverse action against Plaintiff
(Fired day after they got right to due letter from EEOC)
3. There was a causal connection between Plaintiff protected activity and Defendant's adverse

action; and

(I had been an employee for over 6 years at this time they got the right to sue letter the same time I did they thought that I had no help at that time they fired in less than 24 hours in the middle of the month and absolutely didn't ever tell me anything and fired me for absolutely no reason except although I've been on leave of absence for over 2 years at the time and they had been paying me long-term disability and they knew all this yet they fired me for no reason d day after right to see letter from the EEOC. Also their attorneys in an answer to this court has said they were not aware and had no knowledge of any EEOC complaint or right to sue lettet further proof that it was retaliation that continues.)

4 Defendant's action would deter a reasonable person from engaging in protected activity.

(no one would file knowing they would be fired, and they are trying to make me the bad guy they answered the complaint at EEOC and stated no idea in federal court???)

A. Plaintiff alleges that they engaged in protected activity by submitting a religious accommodation request and filing a complaint with the EEOC, Plaintiff alleges that Defendant took adverse action against them by firing them in less than 24 hours after Tyson Fresh Meats Inc got the right to sue letter and Tyson Fresh Meats Thought CKM can't fight back they fired me and didn't have a clue that I'm not what they thought I was No notice just fired me in direct retaliation to EEOC filing and they were sure I was gonna just go away I am here with all the letters and emails firing just an absolutely horrible way to treat employees and I am ready to start telling people since I'm getting nowhere fast on trying to get Tyson Fresh Meats Inc to help someone they hurt... These attorneys lied behind # 4 on the answer twice they did not know about EEOC (I sent to court their position statement to EEOC complaint they did know about the lie again as did the other closely related case lie to this court on same two answers hmmm Retaliation is why fired next day... behind the either #4 or #6 they agreed this court had jurisdiction then a period. And stated they had no knowledge of the complaint but behind that the Defendants attorneys stated no knowledge of right to sue letter same as the very closely related case they both stated lies they knew and they knew that the Defendant Retaliated thinking I had no help and would just fall down and quit so they fired me for no reason and not telling me at all. I found out due to the fact I was trying to get a snap food and needed a year a pay stub for the state. I had to go there to get it, I got a ride and was Informed I had been terminated with no reason and she could not tell me why said call back that is what she told me and there is no reason on form (court have a copy of 12-14-22 right to sue cc to Defendant and court has copy of 12-15-2022 fired no reason and not telling why that CKM was terminated for to this date still no reason except retaliation.)

IV Negligence:

Plaintiff alleges that Defendant acted negligently, causing them harm. To establish a claim for negligence, Plaintiff must establish the following elements:

Defendant owed a duty of care to Plaintiff

(Employers owe the duty of care to guarantee not to have discrimination against the employees or people applying for a job. They break that duty when they absolutely discriminated against me themselves do both disparate impact and disparate treatment)

2. Defendant breached that duty of care

(They discriminated against me)

3. Plaintiff alleges injuries or damages and

(Have lifelong disability now due to it I can't play with my kids due to it my whole life has changed due to it My incomes changed due to it My credit got changed due to it, lost pay lost ability to live at all like I was prior to these events)

4, Defendant's breach of duty was the cause of Plaintiff's injuries or damages,

(Without them discriminating against me taking the medical treatment none of this would have happened to me if they accommodate none of this would have ever even happened. If they hadn't done that one single thing and made me take medical treatment or be homeless then I would not be disabled at this moment)

A. The Plaintiff alleges The defendant we're negligent the moment to tell you themselves discriminated against me that breaches their duty of care so everything that follows is their fault and their negligence and now I have a disability physicallyand that every interaction the Defendant has in every act towards CKM since the Defendant sent me home on 10-22-2021 they have tried to hurt me made my every interaction they acted like I was the one doing wrong like I sent them bullying threatening intentional letters of complete wrote to harm me. Tyson Fresh Meats Inc. methods hurt me in every way my emails shows my emotional state read the 72 HOURS OR OUT of Employment RECORDS come on bully boy,! All of this has been a big joke to them. They can Lie to a federal court or not care about the Texas governor but I want this court to know they did lie to this court also. Please hold them responsible. I have not lied and have sent proof for every statement that is a fact or happened in good conscience. I know that I have been honest with everything I've said, everything that I told you and this Court happened. Everything I stated did happen and I provided proof for everything.

I am the only truth in this case between the Plaintiff and Defendant. I have provided documentation for every truth I've told this court not one accusation all facts, I pray that this court can see that and finds overwhelming in CKM FAVOR Amen

Damages:

Plaintiff seeks the following damages as result of Defendant's actions:

Plaintiff therefore seeks relief for Religious Discrimination by disparate treatment, and disparate impact.

Under Title VII, including but not limited to back pay, front pay, compensatory, damages, punitive damages, injunctive relief, pain and suffering, Intentional Infliction of Emotional Distress, Retaliation, and Negligence. I don't know if have to put a dollar amount haven't purposely but I want to stay legal for this court

\$3,300,000.00

09-13-2023

Christopher K McNeill
cmcneill0114@gmail.com
806-410-6215

